Clean Air Facts

Key Elements in a Permit Application

SBCA-APG2-0601

The Department of Natural Resources (DNR) Air Program is required to complete their review of air pollution permit applications in a certain amount of time, depending on the type of permit. This time frame starts when the Air Program has a complete application on file. Often delays come into the process when the permit reviewer has to request additional information to make what was submitted into a complete application. There are a number of things that an applicant can watch out for to reduce or eliminate those delays.

A Daunting Task

Completing an air pollution permit application can be a very complex task. For that reason, it is understandable that certain elements will be glanced over, done partially or not at all, or done incorrectly because of a misunderstanding with the instructions.

Make Some Contacts

The first and best way to solve the problem is contact someone who can answer any questions you have about how you are filling out the application. Contact your local DNR Air Program permit writer. The Small Business Clean Air Assistance Program (SBCAAP) has a fact sheet that lists DNR regional air staff by their location and area of expertise (permits, compliance, etc.). If you have a concern about dealing with the DNR, you can contact the SBCAAP staff first to get free, confidential, non-regulatory assistance.

Specific Elements To Be Aware Of

DNR permit staff have listed the following elements as those most likely to be forgotten or done incorrectly on applications.

Be sure to include:

➜ Accurate scale on all maps and plot plans;

⁕ This is very important to the modeling process. See the **Modeling Emissions for Permits** Fact Sheet published by SBCAAP for details on that process.

➜ All emissions for each pollutant from each process;

➜ Example calculations for at least one pollutant for each process;

➜ All necessary throughputs for the calculations;

⁕ For a spray paint operation DNR will need to use the total raw material throughput (paint + weight of parts) for the particulate matter emissions requirements. The painting/coating form 4530-108 doesn't really have a space for that, so include it on an attachment form 4530-135 for that process.

➜ Equipment maximum application or throughput rates based on design;

⁕ The equipment throughput rates should not be based on normal operations, unless you already run them

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at their maximum possible rate. See the **MTE and PTE Calculation Examples** Fact Sheet for more details on determining the maximum rates.

➜ Material Safety Data Sheets for each raw material;

⁕ If you have a large number of similar materials (i.e. only the color pigment changes), you may include just one as a representative, but be sure to let DNR know that in the application somewhere.

➜ All necessary application forms (don't skip some or use your own sheets if the information doesn't quite fit);

➜ The check to DNR for the air pollution construction permit application fee ($1350.00) - DNR may not start the review until it is received;

➜ **TWO** copies of any application and related materials.

Here are some other ideas that could help your application's review process move more quickly.

For Construction Permits:

☞ Submit the application early enough.

✔ Requesting an expedited review saves 30 calendar days on average. But an expedited review costs an extra **$2650**. You have to weigh the benefits.

✔ A minor source application, without expedited review, can take a **minimum** of 90 calendar days to complete.

☞ Request a public hearing early if the project will be controversial with the neighbors.

✔ This becomes important with Environmental Justice issues. Contact DNR at 608/267-9500 if you have questions on Environmental Justice.

✔ It will also save a lot of time. Having to schedule a public hearing after the public comment period is over, adds from 60-120 days to the process and possibly more if there are a number of contentious issues.

☞ If you already have an operation permit and are adding or modifying processes, use the electronic filing option, because this will make the review process quicker for the DNR permit staff who use electronic permit software that writes parts of the permit using your application information.

For Operation Permits:

☞ Use the electronic filing option, because this will make the review process quicker for the DNR permit staff.

✔If you need help with the electronic filing software for air permits, you can call Renée Lesjak Bashel of the SBCAAP at 608/264-6153 for assistance.

☞ For a renewal of an operation permit, talk with your DNR regional permit writer to make sure changes you want made DO NOT require a construction permit review as well.

☞ If you request limits to allow you to meet or avoid a specific requirement, make sure that they are reasonable for your present AND **future** operations.

✔ You don't want to perform a stack test only to find you can't meet the limit.

✔ You don't want to expand so quickly that you can no longer meet a cap emission limit you just requested in your permit.

Why don't you want to do these things? Either case becomes a violation of your permit. You might need to go through another permit process to correct the problem or be subject to enforcement by DNR or EPA.

What About Alternate Operating Scenarios?

Operation permits are able to distinguish between different operating scenarios for a process that might have different requirements that apply to each. An operation permit application needs to include forms that cover each of these scenarios for them to be included in the permit.

It may also be possible to include a scenario to cover a situation if a control device malfunctions but there is a way you can continue to operate your process in compliance with all emissions limits and other requirements. For example, on a coating line there is usually a limit on VOC content of the coatings used or an equivalent level of control via an add-on device like an incinerator.

If you usually use an incinerator to meet the limit, but do have some coatings that would meet the limit without control you can set an alternate scenario that when the incinerator goes down you will only run jobs that have the coatings that meet the limits. This is still better than having to shutdown the whole process when the incinerator malfunctions. Or you might be able to do daily averaging of coatings that are above and below the VOC content limit, such that the average will meet the VOC content limit. This is allowed normally, but not everyone wants to keep the daily records that are required to use this option. But for the few days your incinerator is down keeping daily records may be the least inconvenient option.

There are many possible scenarios that you can propose to DNR for inclusion in your operation permit. Discuss any ideas you have with your permit writer. You will need to amend your permit application if you find alternate scenarios that you didn't think of at the time you submitted the original application.

Contacts for More Information or Assistance.

The Small Business Clean Air Assistance Program, in the Wisconsin Department of Commerce, helps smaller businesses understand and comply with the Clean Air Act regulations. Contact one of the program's Clean Air Specialists for more assistance: Renée Lesjak Bashel at 608/264-6153 or Tom Coogan at 608/267-9214.

For further information on permit applications, contact your DNR Regional or Service Center office shown on the **DNR Contact Fact Sheet** or the DNR's Central office at 608/267-9500.